

REMARKS

Claims 1-14 are currently pending. By this Amendment, claim 1 is amended. No new matter is added. Reconsideration of the application is respectfully requested.

Applicant notes with appreciation the indication of allowable subject matter in claims 2-8, 11 and 12. These claims are not written in independent form at this time because their base claim 1 is patentable as described below.

The Office Action rejects claim 1 under 35 U.S.C. §102(b) over U.S. Patent No. 4,799,304 to Cinzori et al. (Cinzori). This rejection is respectfully traversed.

Claim 1 recites, *inter alia*, that the motor has a drive mode and a power generation mode, and that the control device controls the motor to function as a motor under the drive mode and as a generator under the power generation mode. This feature is described in the specification at, for example, page 17, lines 13-21.

Cinzori, on the other hand, is directed to an alternator that supplies D.C. electrical power to automotive vehicles. See col. 1, lines 7-9 of Cinzori. Cinzori does not teach or suggest that his alternator has a drive mode in which the control module 10 of Cinzori causes the alternator to function as a drive motor. Therefore, Cinzori does not teach or suggest this feature. Accordingly, claim 1 is patentable over Cinzori. Thus, withdrawal of the rejection is respectfully requested.

The Office Action rejects claims 9, 10, 13 and 14 under 35 U.S.C. §103(a) over Cinzori in view of U.S. Patent No. 6,538,356 to Jones. This rejection is respectfully traversed.

As discussed above, Cinzori does not teach or suggest the features of claim 1. Jones is applied for disclosing an arrangement of electrode plates and therefore does not overcome the deficiency of Cinzori with respect to claim 1. Therefore, claims 9, 10, 13 and 14 are

allowable at least for their dependence on claim 1, as well as for the additional features they recite. Thus, withdrawal of the rejection is respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-14 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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